## Exhibit 9

## EXHIBIT 9

## DECLARATION OF MOLLY WHITE IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

Molly White, upon oath and affirmation, hereby deposes and says:

- 1. I make this declaration upon my personal knowledge of the facts, and I am competent to testify to the facts stated herein.
- 2. I am a 49 year-old mother of two living children, two aborted children, two stillborn children and a child who miscarried at about 7-8 weeks. I am a resident of Belton, Texas.
- 3. My first abortion was in 1981, when I was 23. My second abortion was in 1985. Both were in Texas.
- 4. At the time of my first abortion I needed information and help. A doctor suggested that abortion was the answer to my problem, he said, "abortion is safe and my life would get back to normal." My emotions were battling within me when I was contemplating abortion. I loved children, especially babies. I did not know anything about fetal development, abortion procedures or the risks of abortion. When I went to the abortion clinic I had questions. I specifically asked the abortion clinic staff about fetal development and the risks of abortion. I was told my 8-10 week old developing baby was just a tiny speck of tissue, and that the procedure was safe and relatively painless with no risks involved. I later found out that these two answers were untrue. The abortion clinic workers withheld vital information when I asked for it.
- 5. I also needed information about abortion alternatives or crisis pregnancy centers where I could go for information and help. I wish that I had received more

information or had the opportunity to talk to someone. I believe if I had heard all the facts, I would have made a more informed decision and would not have chosen abortion.

- 6. I did not have a chance to talk with the doctor before he performed the surgery. I did not have time to decide what I wanted to do. If someone had been outside the clinic offering help and information, I would have decided against abortion. I made the most regrettable decision of my life based on deception and lack of information.
- 7. I was told legal abortion was safe yet I suffered from a damaged cervix and uterine scarring. I believe these complications played a role in my miscarriage and in the deaths of two of my triplets who were stillborn. My cervical damage required me to deliver my children by Caesarean section. I had to have a partial hysterectomy at the early age of 37 years because of all the uterine scarring, a benign tumor and continual bleeding. I was not told of the risk of physical complications. I was not allowed to make an informed decision.
- 8. My second abortion was unwanted. I was heavily pressured by my parents to abort my third pregnancy because they did not want to face the embarrassment of their daughter having another child out of wedlock. The doctor performing the abortion knew I did not want to have an abortion and knew I was being pressured. Instead of offering me help and encouragement he took advantage of my weakened emotional state and began a two day abortion procedure. After he inserted laminara in my cervix to begin the abortion I told him to take it out. Then I told him that I did not want the abortion because I had already endured a previous abortion and had just buried two of my triplets who were stillborn a year and a half prior. The doctor told me that he could not remove the laminara because it could damage my cervix. I later learned that this was untrue. The

next day when I returned to his office for the completion of the procedure I cried and told

him that I did not want to have the abortion. I told him that I never wanted it and I was

being pressured. He told me it was too late and I had to go through with it. He never

offered me any help or any information. He performed the abortion while I cried and

sobbed and begged him not to. This experience was very devastating and has taken years

to heal from.

9. In addition to the physical pain I had longer-lasting emotional pain. Because I

was misinformed and exploited by the abortion clinics, I went against my natural

maternal instincts to protect my children and to give birth. This has taken a heavy

psychological and emotional toll on my life and the life of my family.

10. Unfortunately there was no one to talk to me outside the clinics where I had

my abortions. I needed information and alternatives and time to think things over. I did

not get correct information from clinic staff. If sidewalk counselors had been there to

give me an independent source of information, I would not have made the two most

regrettable decisions of my life. Today I would be the mother of those children.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 13th day of January, 2008.